Exhibit 2

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 2 of 15 PageID: 735 Bianchi, et al. v. Samsung Electronics America, Inc., D.N.J., No. 2:17-cv-01263

	COUNT I: UNJUST ENRICHMENT								
Plaintiff	State	Fails Because Relationship Governed by Limited Warranty	Fails Because Refrigerators Continued To Be Used	Fails Because Plaintiffs Do Not Plead They Expected Remuneration From SEA	Fails Because No Benefit Conferred Upon SEA	Fails Because Unjust Enrichment Not an Independent Cause of Action			
		(Part III.A)	(Part III.A)	(Part III.A)	(Part III.A)	(Part III.A)			
Bianchi, R.	VA	X	X	X					
Bianchi, D.	VA	X	X	X					
Marino	FL	X	X						
Bishop	FL	X	X						
Castelo, M.	CA	X	X			X			
Castelo, F.	CA	X	X			X			
Mahoney, J.	NJ	X	X	X	X				
Mahoney, L.	NJ	X	X	X	X				
Cecconi, R.	PA	X	X						
Cecconi, P.	PA	X	X						
Kauffman	PA	X	X						
Rosengarten	PA	X	X						

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 3 of 15 PageID: 736 Bianchi, et al. v. Samsung Electronics America, Inc., D.N.J., No. 2:17-cv-01263

Defendant Samsung Electronics America, Inc.'s Motion to Dismiss First Amended Class Action Complaint (April 24, 2018)

COUNTS II, VIII, X, XIII, XVI and XVIII: IMPLIED WARRANTY OF MERCHANTABILITY **Fails Because the Limited** Fails Because Keeps **Fails to the Extent Based** Warranty Limited the **Refrigerators Fit for** on UCC Provisions Fails for Lack of Pre-Suit **Fails Because Does Not Implied Warranty of** Their Ordinary Purpose Notice Allege Privity with SEA **Applicable to Leased Plaintiff** State Merchantability to One at the Time of Delivery Goods Year (Part III.C.1) (Part III.C.2-3) (Part III.C.4) (Part III.C.5) (Part III.C.6) Bianchi, R. VA X X X Bianchi, D. VA \mathbf{X} FL X X X X Marino X Bishop FL X X X X X Castelo, M. CA X X X Castelo, F. CAX X X X X Mahoney, J. NJ X X X NJ X Mahoney, L. X PA Cecconi, R. X X \mathbf{X} \mathbf{X} X Cecconi, P. PA X X X X X Kauffman PA X PA Rosengarten

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 4 of 15 PageID: 737 Bianchi, et al. v. Samsung Electronics America, Inc., D.N.J., No. 2:17-cv-01263

	COUNT III: INJUNCTIVE AND DECLARATORY RELIEF							
Plaintiff	State	Declaration Sought Misconstrues Purpose of Declaratory Judgment	Declaratory Relief Fails Because No Alleged Facts of Likelihood of Future	Declaratory Relief Fails Because Duplicative of Relief Sought From Other	Injunctive Relief Is a Remedy, Not Cause of	Injunctive Relief Fails Because Lack of Allegations for Elements		
		Act (Part III.G)	Injury (Part III.G)	Claims (Part III.G)	Action (Part III.G)	of Injunctive Relief (Part III.G)		
Bianchi, R.	VA	X	X	X	X	X		
Bianchi, D.	VA	X	X	X	X	X		
Marino	FL	X	X	X	X	X		
Bishop	FL	X	X	X	X	X		
Castelo, M.	CA	X	X	X	X	X		
Castelo, F.	CA	X	X	X	X	X		
Mahoney, J.	NJ	X	X	X	X	X		
Mahoney, L.	NJ	X	X	X	X	X		
Cecconi, R.	PA	X	X	X	X	X		
Cecconi, P.	PA	X	X	X	X	X		
Kauffman	PA	X	X	X	X	X		
Rosengarten	DΛ	V	V	V	V	V		

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 5 of 15 PageID: 738 Bianchi, et al. v. Samsung Electronics America, Inc., D.N.J., No. 2:17-cv-01263

	COUNT IV - STRICT LIABILITY - DESIGN DEFECT							
Plaintiff	State	Fails Because Claim Barred Under of Economic Loss Doctrine	Fails Because Plead No Design Defect	Fails Because Do Not Allege Refrigerators Are "Unreasonably Dangerous"	Fails Because Do Not Allege Existence of Alternative Design	Fails Because Barred by New Jersey Products Liability Act	Fails Because Plead No Claim Recognized by California Law	Fails Because Virginia Does Not Recognize Strict Liability Claim
		(Part III.D.1)	(Part III.D.2)	(Part III.D.3.a)	(Part III.D.3.b)	(Part III.D.3.c)	(Part III.D.3.d)	(Part III.D.4)
Bianchi, R.	VA	X						X
Bianchi, D.	VA	X						X
Marino	FL	X	X	X				
Bishop	FL	X	X	X				
Castelo, M.	CA	X	X				X	
Castelo, F.	CA	X	X				X	
Mahoney, J.	NJ	X	X		X	X		
Mahoney, L.	NJ	X	X		X	X		
Cecconi, R.	PA	X	X	X	X			
Cecconi, P.	PA	X	X	X	X			
Kauffman	PA	X	X	X	X			
Rosengarten	PA	X	X	X	X			

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 6 of 15 PageID: 739 Bianchi, et al. v. Samsung Electronics America, Inc., D.N.J., No. 2:17-cv-01263

	COUNT V: FRAUDULENT CONCEALMENT								
Plaintiff	State	Fails Because Does Not Satisfy Rule 9(b)	Fails Because Alleges No False Representation by SEA	Fails Because Alleges No Facts Showing SEA's Knowledge	Fails Because Alleges No Intent by SEA to Conceal	Fails Because Alleges No Reliance Upon Any Purportedly False Representation by SEA	Fails Because Alleges No Facts That SEA Owed a Duty to Disclose		
		(Part III.F.1)	(Part III.F.2.a)	(Part III.F.2.b)	(Part III.F.2.c)	(Part III.F.2.d)	(Part III.F.2.e)		
Bianchi, R.	VA	X	X	X	X	X	X		
Bianchi, D.	VA	X	X	X	X	X	X		
Marino	FL	X	X	X	X	X	X		
Bishop	FL	X	X	X	X	X	X		
Castelo, M.	CA	X	X	X	X	X	X		
Castelo, F.	CA	X	X	X	X	X	X		
Mahoney, J.	NJ	X	X	X	X	X	X		
Mahoney, L.	NJ	X	X	X	X	X	X		
Cecconi, R.	PA	X	X	X	X	X	X		
Cecconi, P.	PA	X	X	X	X	X	X		
Kauffman	PA	X	X	X	X	X	X		
Rosengarten	PA	X	X	X	X	X	X		

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 7 of 15 PageID: 740 Bianchi, et al. v. Samsung Electronics America, Inc., D.N.J., No. 2:17-cv-01263

	COUNT VI: STRICT LIABILITY - FAILURE TO WARN						
Plaintiff	State	Fails Because Claim Barred Under Economic Loss Doctrine	Fails Because Virginia Does Not Recognize Strict Liability Claim				
		(Part III.D.1)	(Part III.D.4)				
Bianchi, R.	VA	X	X				
Bianchi, D.	VA	X	X				
Marino	FL						
Bishop	FL						
Castelo, M.	CA						
Castelo, F.	CA						
Mahoney, J.	NJ	N/A Assorted only on hol	half of Vincinia Dlaintiffe				
Mahoney, L.	NJ	N/A Asserted only on bel	nan or virginia riamuns				
Cecconi, R.	PA						
Cecconi, P.	PA						
Kauffman	PA						
Rosengarten	PA						

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 8 of 15 PageID: 741 Bianchi, et al. v. Samsung Electronics America, Inc., D.N.J., No. 2:17-cv-01263

	COUNT VII - VIRGINIA CONSUMER PROTECTION ACT							
Plaintiff Stat		Fails Because Does Not Satisfy Rule 9(b)	Fails Because Alleges No Misrepresentations or Omission	Fails Because Does Not Allege Reliance	Fails Because Alleges No Deliberate, Knowing Acts by SEA			
		(Part III.E.1)	(Part III.E.2)	(Part III.E.2)	(Part III.E.2)			
Bianchi, R.	VA	X	X	X	X			
Bianchi, D.	VA	X	X	X	X			
Marino	FL							
Bishop	FL							
Castelo, M.	CA							
Castelo, F.	CA							
Mahoney, J.	NJ		N/A Asserted only on hel	half of Virginia Plaintiffs				
Mahoney, L.	NJ		N/A Asserted only on ber	nan or virginia riamunis				
Cecconi, R.	PA							
Cecconi, P.	PA							
Kauffman	PA							
Rosengarten	PA							

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 9 of 15 PageID: 742 Bianchi, et al. v. Samsung Electronics America, Inc., D.N.J., No. 2:17-cv-01263

	COUNT IX - FLORIDA DECEPTIVE AND UNFAIR TRADE PRACTICES ACT						
Plaintiff State		Fails Because Does Not Satisfy Rule 9(b)	Fails Because Alleges No Facts Showing Deceptive Act by SEA	Fails Because Does Not Allege Causation	Fails Because Does Not Plead Actual Damages		
		(Part III.E.1)	(Part III.E.3)	(Part III.E.3)	(Part III.E.3)		
Bianchi, R.	VA		N/A Asserted only on he	half of Florida Plaintiffs			
Bianchi, D.	VA		N/A Asserted only on behalf of Florida Plaintiffs				
Marino	FL	X	X	X	X		
Bishop	FL	X	X	X	X		
Castelo, M.	CA						
Castelo, F.	CA						
Mahoney, J.	NJ						
Mahoney, L.	NJ		N/A Asserted only on be	shalf of Florida Plaintiffs			
Cecconi, R.	PA	N/A Asserted only on behalf of Florida Plaintiffs					
Cecconi, P.	PA						
Kauffman	PA						
Rosengarten	PA						

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 10 of 15 PageID: 743 *Bianchi, et al. v. Samsung Electronics America, Inc.*, D.N.J., No. 2:17-cv-01263

	COUNT XI -CALIFORNIA CONSUMER LEGAL REMEDIES ACT						
Plaintiff State		Fails Because Does Not Satisfy Rule 9(b) Fails Because Alleges No Misrepresentation or Omission by SEA Fails Because Allege Reliance		Fails Because Alleges No Reliance	Damages Claim Fails for Lack of Statutory Notice to SEA		
		(Part III.E.1)	(Part III.E.6)	(Part III.E.6)	(Part III.E.6)		
Bianchi, R.	VA						
Bianchi, D.	VA	N/A Asserted only on behalf of California Plaintiffs					
Marino	FL		N/A Asserted only on ben	an of Camornia Flamuns			
Bishop	FL						
Castelo, M.	CA	X	X	X	X		
Castelo, F.	CA	X	X	X	X		
Mahoney, J.	NJ						
Mahoney, L.	NJ						
Cecconi, R.	PA		NI/A Asserted only on bole	alf of California Dlaintiffs			
Cecconi, P.	PA	N/A Asserted only on behalf of California Plaintiffs					
Kauffman	PA						
Rosengarten	PA						

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 11 of 15 PageID: 744 Bianchi, et al. v. Samsung Electronics America, Inc., D.N.J., No. 2:17-cv-01263

	COUNT XII - CALIFORNIA UNFAIR COMPETITION LAW							
Plaintiff	State	Fails Because Does Not Satisfy Rule 9(b)	Exposure to Pre-		UCL Unfair Prong Fails	UCL Fraudulent Prong Fails		
		(Part III.E.1)	(Part III.E.6)	(Part III.E.6)	(Part III.E.6)	(Part III.E.6)		
Bianchi, R.	VA							
Bianchi, D.	VA		N/A Assorta	d only on behalf of Califor	nia Plaintiffs			
Marino	FL		N/A Asserte	d only on behalf of Camor	ma i iamuns			
Bishop	FL							
Castelo, M.	CA	X	X	X	X	X		
Castelo, F.	CA	X	X	X	X	X		
Mahoney, J.	NJ							
Mahoney, L.	NJ							
Cecconi, R.	PA		N/A Asserted only on hehalf of Colifornia Plaintiffs					
Cecconi, P.	PA	N/A Asserted only on behalf of California Plaintiffs						
Kauffman	PA							
Rosengarten	PA							

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 12 of 15 PageID: 745 Bianchi, et al. v. Samsung Electronics America, Inc., D.N.J., No. 2:17-cv-01263

		COU	NT XIII - SONG-BE	VERLY CONSUME	R WARRANTY AC	г		
Plaintiff	State	Fails Because the Limited Warranty Limited the Implied Warranty of Merchantability to One Year	Fails Because Keeps Refrigerators Fit for Their Ordinary Purpose at the Time of Delivery	Fails Because California Civil Code § 1791 Limits Implied Warranty to Express Warranty Period	Fails for Lack of Pre-Suit Notice	Fails Because Does Not Allege Privity with SEA	Fails to the Extent Based on UCC Provisions Applicable to Leased Goods	
		(Part III.B.3)	(Part III.B.3)	(Part III.B.3)	(Part III.C.4)	(Part III.C.5)	(Part III.C.6)	
Bianchi, R.	VA							
Bianchi, D.	VA		N/A	Asserted only on beha	alf of California Plai	ntiffs		
Marino	FL		14/11	asserted only on bene		111115		
Bishop	FL							
Castelo, M.	CA	X	X	X	X	X	X	
Castelo, F.	CA	X	X	X	X	X	X	
Mahoney, J.	NJ							
Mahoney, L.	NJ							
Cecconi, R.	PA		NI/A	Asserted only on bob	alf of California Dlai	ntiffs		
Cecconi, P.	PA	N/A Asserted only on behalf of California Plaintiffs						
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Kauffman	PA							

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 13 of 15 PageID: 746 *Bianchi, et al. v. Samsung Electronics America, Inc.*, D.N.J., No. 2:17-cv-01263

	COUNT XIV - NEW JERSEY CONSUMER FRAUD ACT							
Plaintiff	State	Fails Because Does Not Satisfy Rule 9(b)	Fails Because Does Not Plead An Ascertainable Loss	Fails Because Does Not Allege a Misrepresentation or Omission by SEA				
		(Part III.E.1)	(Part III.E.4)	(Part III.E.4)				
Bianchi, R.	VA		-					
Bianchi, D.	VA							
Marino	FL	NI/A Aggarta	d only on boholf of Novy Ion	acr Dlaintiffa				
Bishop	FL	N/A Asserte	d only on behalf of New Jer	sey Flamulis				
Castelo, M.	CA							
Castelo, F.	CA							
Mahoney, J.	NJ	X	X	X				
Mahoney, L.	NJ	X	X	X				
Cecconi, R.	PA							
Cecconi, P.	PA	N/A Asserted only on behalf of New Jersey Plaintiffs						
Kauffman	PA							
Rosengarten	PA							

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 14 of 15 PageID: 747 Bianchi, et al. v. Samsung Electronics America, Inc., D.N.J., No. 2:17-cv-01263

	COUNT XV: EXPRESS WARRANTY							
Plaintiff State		Fails Because No Timely Claim Ever Made by Plaintiffs or Denied by SEA Fails Due to Lack of Pre-Suit Notice		Fails to the Extent Based on UCC Provisions Applicable to Leased Goods				
		(Part III.B.1)	(Part III.B.2)	(Part III.B.3)				
Bianchi, R.	VA		-	•				
Bianchi, D.	VA							
Marino	FL	NI/A A	nted only on behalf of New Journey	Dia:4:66.				
Bishop	FL	N/A Asse	erted only on behalf of New Jersey	Plaintills				
Castelo, M.	CA							
Castelo, F.	CA							
Mahoney, J.	NJ	X	X	X				
Mahoney, L.	NJ	X	X	X				
Cecconi, R.	PA			-				
Cecconi, P.	PA	N/A Asserted only on behalf of New Jersey Plaintiffs						
Kauffman	PA							
Rosengarten	PA							

Case 2:17-cv-01263-CCC-MAH Document 47-3 Filed 04/24/18 Page 15 of 15 PageID: 748 Bianchi, et al. v. Samsung Electronics America, Inc., D.N.J., No. 2:17-cv-01263

COUNT XVII - PENNSYLVANIA UNFAIR TRADE PRACTICES AND CONSUMER PROTECTION LAW						
Plaintiff	State	Fails Because Does Not Satisfy Rule 9(b)	Fails Because Claim Barred Under Economic Loss Doctrine	Fails Because Does Not Allege Reliance	Fails Because Does Not Allege Causation	Fails to Allege Deceptive Conduct by SEA
		(Part III.E.1)	(Part III.B.5)	(Part III.B.5)	(Part III.B.5)	(Part III.B.5)
Bianchi, R.	VA	N/A Asserted only on behalf of Pennsylvania Plaintiffs				
Bianchi, D.	VA					
Marino	FL					
Bishop	FL					
Castelo, M.	CA					
Castelo, F.	CA					
Mahoney, J.	NJ					
Mahoney, L.	NJ					
Cecconi, R.	PA	X	X	X	X	X
Cecconi, P.	PA	X	X	X	X	X
Kauffman	PA	X	X	X	X	X
Rosengarten	PA	X	X	X	X	X